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April 5, 2023

By ECF

Hon. Victor Marrero  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

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**Re:     *United States v. Narek Marutyan, et al., 20 Cr. 652 (VM)***

Dear Judge Marrero:

We write to respectfully request an additional thirty days with which to file motions. Our negotiations with the Government have been fruitful and we recently received a final offer which we anticipate will resolve the case. As the offer includes the possibility of consideration for a global point we are working towards a hopeful global resolution. The additional time requested will enable us to finalize our discussion. The Government has no objection to this request.

Thank you for your consideration.

Respectfully submitted,

/s/ James Kousouros  
James Kousouros, Esq.

c.c.

Emily Deininger  
Assistant United States Attorney

**Request GRANTED.** All briefing deadlines for the proposed pretrial motion shall be extended by thirty (30) days.

**SO ORDERED.**

04/07/2023

**DATE**

  
VICTOR MARRERO, U.S.D.J.